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# **Department of Energy**

Incoming 9404886

AUG 1 2 1994

94-RPS-271

Mr. Randall F. Smith, Director Hazardous Waste Division U.S. Environmental Protection Agency Region 10 1200 Sixth Avenue Seattle, Washington 98101

\_\_Ms. Dru Butler, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
--Olympia, Washington 98504

Dear Mr. Smith and Ms. Butler:

HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION, SIMULATED HIGH-LEVEL WASTE SLURRY TREATMENT AND STORAGE UNIT (SHLWS T/S) PART A PERMIT APPLICATION (FORM-3), REVISION-2

This letter transmits Revision 2 of the Hanford Facility Dangerous Waste Part A Permit Application (Form 3) for the Simulated High Level Waste Slurry (SHLWS) Treatment and Storage (T/S) Unit. Revision 2 provides clarification of the location of the SHLWS T/S Unit within the 1234 Laydown Yard in the 3000 Area, adds two additional waste codes (D008 and D009) for waste characteristics identified during the current review process of the revised Closure Plan, and modifies the waste description to identify the presence of secondary process waste (contaminated soil from two spills and contaminated process equipment). The changes do not significantly alter the scope or content of the Permit Application.

Please note that on May 12, 1994, the U.S. Department of Energy, Richland Operations Office (RL), Westinghouse Hanford Company, and Pacific Northwest Laboratory (PNL) submitted a Notification of Dangerous Waste Activity, Form 2, for noncontiguous dangerous waste generating units and waste management units located in the 3000 Area at the Hanford Site. The May 12, 1994, letter explains the rationale for the submittal of a separate Form 2, and the need for a separate U.S. Environmental Protection Agency (EPA)/State Identification Number for the 3000 Area. Another revised Hanford Facility Dangerous Waste Part A Permit Application (Form 3) will be submitted for the SHLWS T/S Unit after a separate EPA/State Identification Number has been issued for the 3000 Area.



Mr. Smith and Ms. Butler 94-RPS-271

If you have any questions regarding the above, please contact Mr. C. E. Clark of RL on (509) 376-9333, or Mr. H. T. Tilden of PNL on (509) 376-0499.

Sincerely,

//James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance.

Permits, and Policy

B. D. Shipp, Manager

EAP:RNK

Engineeri

Engineering Technology Center Pacific Northwest Laboratory

## Enclosure

cc w/encl:

Administrative Records, H6-08

- J. Atwood, Ecology
- R. Bowman, WHC
- T. Chikalla, PNL
- S. Alexander, Ecology
- D. Duncan, EPA
- G. Davis, Ecology
- \_B.\_Shipp,\_PNL
- J. Stohr, Ecology
- J. Witczak, Ecology

### cc w/o encl:

- D. Nylander, Ecology
- S. Price, WHC
- D. Sherwood, EPA
- R. Jim, YIN
- D. Powaukee, Nez Perce
- W. Burke, CTUIR

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#### III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESS (code "TO4"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

TO4, SO1--This permit covered a one-time proposal to immobilize approximately 200.55-gallon drums of a simulated high level waste slurry (formerly known as "PW-0" and "PW7/7A" material) and secondary waste generated during storage and treatment of the slurry. The program that originally procured this specialty chemical was eliminated before the material was used for R&D purposes. Although the material had been used intermittently, all remaining material with no future use was treated.

The treatment process consisted of neutralization and mixing with a grout within lined 55-gallon, DOT 17H containers. The treatment eliminated the characteristics of ignitability, corrosivity and EP-Toxicity (currently TCLP). Photographs of the treatment equipment and storage areas are attached.

The grouted slurry was stored in drums at the site of treatment (3000 Area, see attached figure) until tests (EP Toxicity, Acute Fish and Rat Toxicity) were completed. These tests verified that the treated waste exhibited no dangerous waste characteristics.

#### IV. DESCRIPTION OF DANGEROUS WASTES

- A. DANGEROUS WASTE NUMBER Enter the four digit number from Chapter 173-303 WAC for each listed dangerous waste you will handle. If you handle dangerous wastes which are not listed in Chapter 173-303 WAC, enter the four digit number(s) that describes the characteristics and/or the toxic contaminants of those dangerous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	К

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

#### 1. PROCESS CODES:

For listed dangerous waste: For each listed dangerous waste entered in column A select the code(s) from the list of process codes contained in Section III to indicate how the waste will be stored, and/or disposed of at the facility.

For non-listed dangerous wastes: For each characteristic or toxic contaminant entered in Column A, select the code(s) from the list of process codes contained in toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: DANGEROUS WASTES DESCRIBED BY MORE THAN ONE DANGEROUS WASTE NUMBER - Dangerous wastes that can be described by more than one Waste Number shall be described on the form as follows:

- 1. -- Select one-of-the Dangerous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other Dangerous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other Dangerous Waste Number that can be used to describe the dangerous waste.

EXAMPLE FOR COMPLETING SECTION IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tenning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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Continued from page 2. NOTE: Photocopy this page before completing if you have more than 26 wastes to list. I.D. NUMBER (entered from page 1) 7 8 9 0 0 0 8 9 6 7 IV. DESCRIPTION OF DANGEROUS WASTES (continued) D. PROCESSES C. UNIT OF MEA-SURE (enter code) A.
I N DANGEROUS
N O WASTE NO. B. ESTIMATED ANNUAL QUANTITY OF WASTE 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) 1. PROCESS CODES (enter) (enter code) <u>\$0</u>1 T04 P plolo 150,000 Storage/treatment D | O | O | DIO 5 0 DIOIO 6 D 0 0 7 1 1 ס [ס] מ 8 סוסום 9 D 0 1 1 W T 0 1 T 10 11 12 13 11 14  $\mathsf{T}$ 15 16 17  $\mathbf{T}$ 18 19 20 21 T 22 23 26 26

ECL30 - 271 - ECY 030-31 Form 3

PAGE 3 \_\_\_\_ OF 7

CONTINUE ON REVERSE

Continued from the front.

#### IV. DESCRIPTION OF DANGEROUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM SECTION D(1) ON PAGE 2.

Material to be treated was designated as ignitable (D001), corrosive (D002)

due to pH ≤2.0 and EP Toxic due to barium (D005), cadmium (D006), chromium (D007), lead (D008), mercury (D009) and silver (D011), and was also slightly radioactive (<2000pCi/g) due to naturally-occurring elements present. (This level of natural occurring radiation was not sufficient to designate the material as mixed waste.) The waste slurries were designation as extremely hazardous waste (EHW) toxic mixtures (WT01). This designation was due to the concentration and toxicity of nitric acid and metallic nitrate salts (i.e., silver nitrate, ferric nitrate) present in the wastes.

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	• •
V. FACILITY DRAWING	
All existing facilities must include in the space provided on page 5 a scale drawing of	f the facility (see instructions for more detail).
VI. PHOTOGRAPHS	
All existing facilities must include photographs leeriel or ground-level) that clearly de sites of future storage, treatment or disposal areas (see instructions for more detail).	
VII. FACILITY GEOGRAPHIC LOCATION This information is	provided on the attached drawings and photos.
LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
VIII. FACILITY OWNER	<u> </u>
VIII. FACILITY OWNER	
A. If the facility owner is also the facility operator as listed in Section VII on Forr below.	n 1, "General Information", place an "X" in the box to the left and skip to Section IX
B. If the facility owner is not the facility operator as listed in Section VII on Form	1 complete the following items.
2. If the lacinty owner is not the lacinty operator as harce in Section 13 off 3 off 3	-1-worklets are tomowild reus!
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1. NAME OF FACILITY'S LEGAL OWN	(ER
3. STREET OR P.O. BOX	4. CITY OR TOWN 5. ST. 6. ZIP CODE
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IX. OWNER CERTIFICATION	<u></u>
<b></b>	a information submitted in this and all attached documents, and that based on the
inquiry of those individuals immediately responsible for obtaining the information. I be there are significant panelties for submitting false information, including the passibility	e information submitted in this and all attached documents, and that based on my lieve that the submitted information is true, accurate, and complete. I am aware that If of fine and imprisonment.
NAME (print or type) SIGNATURE	DATE SIGNED
John D. Wagoner, Manager U.S. Department of Energy	Wagonu 8/12/94
Richland Operations Office	Wyonu 8/17/94
X. OPERATOR CERTIFICATION	
	sinformation subsciesed in this and all assaulted decreases.
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NAME (print or type) Signature	DATE SIGNED
	WITTING CONTRACT
SEE ATTACHMENT	
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### X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Owner/Operator

John D. Wagoner, Manager U.S. Department of Energy Richland Operations Office 8/10/94

Çő-Operator

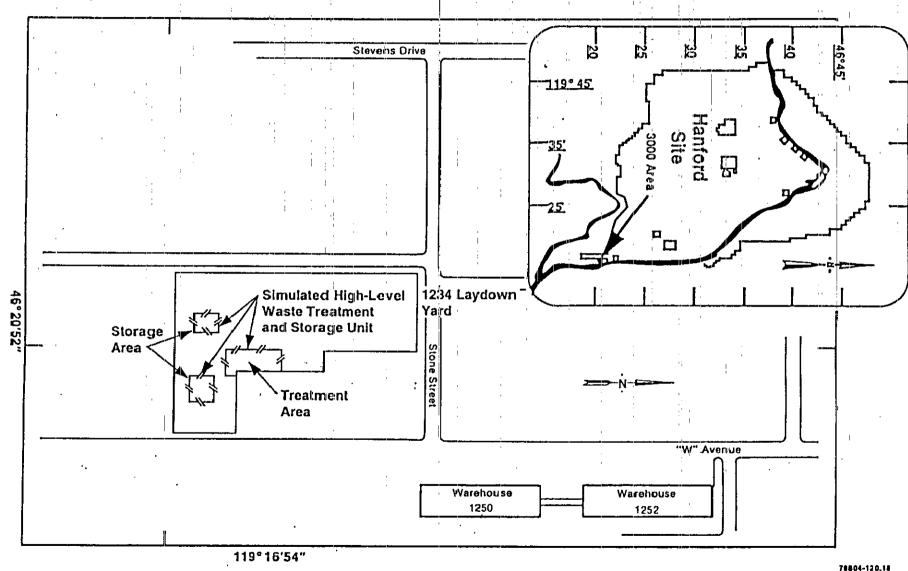
William J. Madia, Director Pacific Northwest Laboratory Date

# Simulated High-Level Waste Slurry Treatment/Storage

Site Plan (3000 Area)

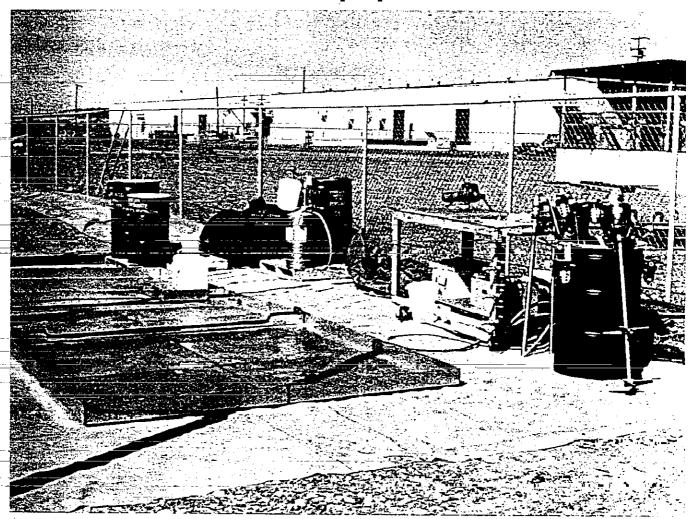
Page

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# Simulated High-Level Waste Slurry Treatment/Storage Treatment Site and Equipment



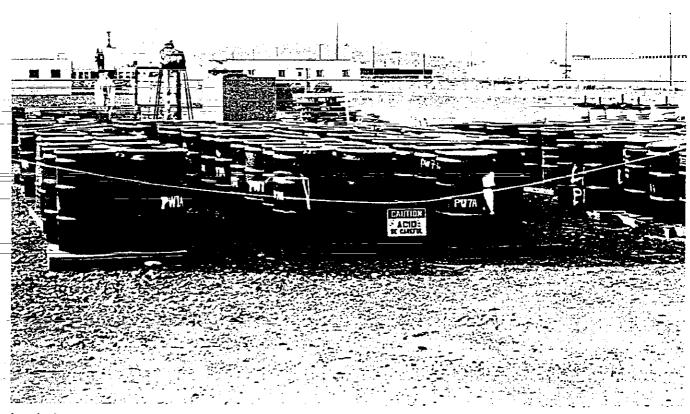
Longitude 119° 16'54" Latitude 46° 20'52"

Photo Taken 1988

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WA7890008967

Simulated High-Level Waste Slurry Treatment/Storage



Longitude 119° 16'54" Latitude 46° 20'52"

Photo Taken 1988

## CORRESPONDENCE DISTRIBUTION COVERSHEET

Author Addressee Correspondence No.

J. E. Rasmussen, RL R. F. Smith, EPA Incoming 9404886
B. D. Shipp, PNL D. Butler, Ecology

- Subject: HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION, SIMULATED HIGH-LEVEL WASTE SLURRY TREATMENT AND STORAGE UNIT (SHLWS T/S) PART A PERMIT APPLICATION (FORM 3), REVISION 2

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		- W. T. Bixon, Assignee	-H6-21	
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		RCRA File/GHL	H6-23	